

TITLE V APPLICATION REVIEW

Project #: 960970
Deemed Complete: 11/25/96

Engineer: Gerardo Gomez
Date: 11/4/97

Facility Number: S-348
Facility Name: West Kern Water District
Mailing Address: P. O. BOX MM
Taft, CA 93268

Contact Name: Gerlin Melton
Phone: (805) 763-3151

Responsible Official: Jerry Pearson
Title: General Manager

I. PROPOSAL

The West Kern Water District is proposing that an initial Title V permit be issued for its Station A facility in Taft. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

II. FACILITY LOCATION

Station A is located at Highway 119 & California Aqueduct in Taft.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit Templates:

A. SJV-UM-0-0, Facility Wide Umbrella

The applicant has requested to utilize template No. SJV-UM-0-0, Facility Wide Umbrella to address facility-wide requirements (S-348-0-0). Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

B. SJV-IC-3-0, Series 3 Internal Combustion Engines

The applicant has requested to utilize template No. SJV-IC-3-0, Series 3 Internal Combustion Engines for the internal combustion engine units S-348-1-4, S-348-2-4, and S-348-3-4 and S-348-4-5. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

C. SJV-IC-4-0, Series 4 Internal Combustion Engines

The applicant has requested to utilize template No. SJV-IC-4-0, Series 4 Internal Combustion Engines for the internal combustion engine units S-348-1-4, S-348-2-4, and S-348-3-4 and S-348-4-5. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA and Public review:

Conditions 1-39 of facility wide requirements (S-348-0-0).

Conditions 1 through 11 Permit unit S-348-1-4.

Conditions 1 through 11 Permit unit S-348-2-4.

Conditions 1 through 11 Permit unit S-348-3-4.

Conditions 1 through 11 Permit unit S-348-4-5.

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1100, Equipment Breakdown (as amended December 17, 1992)¹

District Rule 1160, Emission Statements (as adopted November 18, 1992)¹

District Rule 2010, Permits Required (as amended December 17, 1992)¹

District Rule 2020, Exemptions (as amended July 21, 1994)¹

District Rule 2031, Transfer of Permits (as amended December 17, 1992)¹

District Rule 2040, Applications (as amended December 17, 1992)¹

District Rule 2070, Standards for Granting Applications (as amended December 17, 1992)¹

District Rule 2080, Conditional Approval (as amended December 17, 1992)¹

District Rule 2520, Federally Mandated Operating Permits, Sections 9.5.1, 9.4.2², 9.5.2², 9.6.1, 9.6.2, 9.8, 9.9.1, 9.9.2, 9.9.3, 9.9.4, 9.9.5, 9.10, 9.13.1, 9.14.1, 9.14.2, 9.17, and 10.0 (adopted June 15, 1995)¹

¹ Model General permit template SJV-UM-0-0 addressed the facility wide requirements.

District Rule 4101, Visible Emissions (as amended December 17, 1992) ¹

District Rule 4601, Architectural Coatings (as amended December 17, 1992) ¹

District Rule 8020, 8030, and 8060 Fugitive Dust PM-10 Emissions (as amended April 25, 1996) ¹

40 CFR Part 61, Subpart M National Emission Standard for Asbestos ¹

40 CFR Part 82, Stratospheric Ozone ¹

District Rule 4201 Particulate Matter Concentration, Section 3.1 (as amended December 17, 1992) ²

Kern County Rule 407, Sulfur Compounds ²

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

New and Modified Stationary Source Review Rule (NSR)

District Rule 1081, Source Sampling (Amended December 16, 1993) (Non-SIP replacement for Kern County Rule 108.1)

VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as Federally Enforceable Through Title V Permit.

This facility is subject to the following rules that are currently not federally enforceable:

¹ Model General permit template SJV-UM-0-0 addressed the facility wide requirements, except for District Rule 2520, 9.4.2.

² Model General permit template SJV-IC-3-0 and SJV-IC-4-0 addressed these requirements for permit units (S-348-1-4, S-348-2-4, S-348-3-4, and S-348-4-5).

District Rule 4701, Internal Combustion Engines (Amended December 19, 1996)

District Rule 4102, Nuisance (Amended December 17, 1992)

For this facility, conditions 11, 14, 15, 16, 17, 19, and 20 of Operating Permits S-348-1-4, S-348-2-4, S-348-3-4, and conditions 11, 14, 15, 16, 17, 19 and 20 of Operating Permit S-348-4-5 are based on the rules listed above and are not Federally Enforceable through Title V.

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

1. Facility Wide Requirements

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-0 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to Operating Permit S-348-0-0 as condition numbers 1 through 39 to assure compliance with these requirements.

2. Four IC Engines

a. Natural Gas Firing

The applicant is proposing to use general permit template SJV-IC-3-0, to address federally applicable requirements for internal combustion engine units S-348-1-4, S-348-2-4, S-348-3-4, and S-348-4-5 when fired on natural gas. Section IV of template SJV-IC-3-0 includes a demonstration of compliance for applicable requirements. Template conditions number 1 through 9 have been added to the requirements for permit units S-348-1-4, S-348-2-4, S-348-3-4, and S-348-4-5 to assure compliance with these requirements.

Conditions 3, 5, and 6 of the requirements for permit units S-348-1-4, 2-4, 3-4, and 4-5 added clarification to avoid conflict with the sulfur limits of the other template.

b. LPG Firing

The applicant is proposing to use general permit template SJV-IC-4-0 to address federally applicable requirements for internal combustion engine units S-348-1-4, S-348-2-4, S-348-3-4, and S-348-4-5 when fired on LPG. Section IV of template SJV-IC-4-0 includes a demonstration of compliance for applicable requirements. Template condition number 4 have been added to the requirements for permit units S-348-1-4, S-348-2-4, S-348-3-4, and S-348-4-5 as condition 10 to assure compliance with these requirements. The remaining conditions from template SJV-IC-4-0 that are the same as conditions in template SJV-IC-3-0 have also been added to the permit units S-348-1-4, S-348-2-4, S-348-3-4, and S-348-4-5.

Condition 1 from the template SJV-IC-4-0 was combined with condition 3 from template SJV-IC-3-0 to avoid conflict with the sulfur limitations of each template, and to allow for usage of two different fuels in the IC Engine.

B. Requirements Not Addressed by Model General Permit Templates

1. New and Modified Stationary Source Review Rule (NSR)

a. Natural Gas Fired IC Engine Unit (S-348-1-3)

Permit unit S-348-1-3 was subject to the NSR Rule at the time the applicant applied for Authority to Construct (ATC) these units. ATC S-348-1-3 was issued by the District on 3/24/97.

- Condition 1 from the ATC is included as condition 11 of the requirements for permit unit S-348-1-4. This condition is not Federally enforceable because it is based on the public nuisance requirement of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the ATC is included in condition 2 of the requirements for permit unit S-348-1-4.
- Condition 3 from the ATC is included in condition 12 of the requirements for permit unit S-348-1-4.
- Condition 4 from the ATC is included as condition 13 of the requirements for permit unit S-348-1-4.

- Condition 5 from the ATC was not included in the requirements for permit unit S-348-1-4. This condition specifies a engine output limit (778 HP) which is already specified in the equipment description.
- Condition 6 from the ATC is included as condition 14 of the requirements for permit unit S-348-1-4. Condition 6 of the ATC specifies NOx emission limits (i.e. 90% reduction on initial source test and 80% thereafter, or 90 ppmv) that were added to the ATC to assure compliance with District Rule 4701. District Rule 4701 is not in the SIP. Therefore, this condition is not federally enforceable.
- Condition 7 from the ATC is included as condition 15 of the requirements for permit unit S-348-1-4. Condition 7 of the ATC specifies CO emission limits (i.e. 2000 ppm) that were added to assure compliance with District Rule 4701. District Rule 4701 is not in the SIP. Therefore, this condition is not federally enforceable.
- Condition 8 from the ATC is included as condition 16 of the requirements for permit unit S-348-1-4. This condition is not federally enforceable because it assure that the permit unit is exempt from the provisions of District Rule 4701 during natural gas curtailment. District Rule 4701 is not contained in the SIP. Condition 8 from the ATC limits propane backup fuel to 336 hours per year.
- Condition 9 from the ATC is included as condition 17 of the requirements for permit unit S-348-1-4. Condition 9 of the ATC requires source testing every 24 months to show compliance with the CO and NOx emission limits. This is included in the ATC as a compliance testing requirement of Rule 4701. District Rule 4701 is not in the SIP. Therefore, this condition is not federally enforceable.
- Condition 10 from the ATC is included as condition 18 of the requirements for permit unit S-348-1-4.
- Condition 11 from the ATC is included as condition 19 of the requirements for permit unit S-348-1-4. This condition is not federally enforceable because it requires recordkeeping in accordance with District Rule 4701. District Rule 4701 is not contained in the SIP.

b. Natural Gas Fired IC Engine Unit (S-348-2-3)

Permit unit S-348-2-3 was subject to the NSR Rule at the time the applicant applied for Authority to Construct (ATC) these units. ATC S-348-2-3 was issued by the District on 3/24/97.

- Condition 1 from the ATC is included as condition 11 of the requirements for permit unit S-348-2-4. This condition is not Federally enforceable because it is based on the public nuisance requirement of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the ATC is included in condition 2 of the requirements for permit unit S-348-2-4.
- Condition 3 from the ATC is included as condition 12 of the requirements for permit unit S-348-2-4.
- Condition 4 from the ATC is included as condition 13 of the requirements for permit unit S-348-2-4.
- Condition 5 from the ATC has been not been included as in the requirements for permit unit S-348-2-4. This condition specifies a engine output limit (778 HP) which is already specified in the equipment description.
- Condition 6 from the ATC is included as condition 14 of the requirements for permit unit S-348-2-4. Condition 6 of the ATC specifies NOx emission limits (i.e. 90% reduction on initial source test and 80% thereafter, or 90 ppmv) that were added to the ATC to assure compliance with District Rule 4701. District Rule 4701 is not in the SIP. Therefore, this condition is not federally enforceable.
- Condition 7 from the ATC is included as condition 15 of the requirements for permit unit S-348-2-4. Condition 7 of the ATC specifies CO emission limits (i.e. 2000 ppm) that were added to assure compliance with District Rule 4701. District Rule 4701 is not in the SIP. Therefore, this condition is not federally enforceable.
- Condition 8 from the ATC is included as condition 16 of the requirements for permit unit S-348-2-4. This condition is not federally enforceable because it assure that the permit unit is exempt from the provisions of District Rule 4701 during natural gas curtailment. District Rule 4701 is not contained in the SIP. Condition 8 from the ATC limits propane backup fuel to 336 hours per year.
- Condition 9 from the ATC is included as condition 17 of the requirements for permit unit S-348-2-4. Condition 9 of the ATC requires source testing every 24 months to show compliance with the

CO and NOx emission limits. This is included in the ATC as a compliance testing requirement of Rule 4701. District Rule 4701 is not in the SIP. Therefore, this condition is not federally enforceable.

- Condition 10 from the ATC is included as condition 18 of the requirements for permit unit S-348-2-4.
- Condition 11 from the ATC is included in condition 19 of the requirements for permit unit S-348-2-4. This condition is not federally enforceable because it requires recordkeeping in accordance with District Rule 4701. District Rule 4701 is not contained in the SIP.

c. Natural Gas Fired IC Engine Unit (S-348-3-3)

Permit unit S-348-3-3 was subject to the NSR Rule at the time the applicant applied for Authority to Construct (ATC) these units. ATC S-348-3-3 was issued by the District on 3/24/97.

- Condition 1 from the ATC is included as condition 11 of the requirements for permit unit S-348-3-4. This condition is not Federally enforceable because it is based on the public nuisance requirement of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the ATC is included in condition 2 of the requirements for permit unit S-348-3-4.
- Condition 3 from the ATC is included as condition 12 of the requirements for permit unit S-348-3-4.
- Condition 4 from the ATC is included as condition 13 of the requirements for permit unit S-348-3-4.
- Condition 5 from the ATC has not been included in the requirements for permit unit S-348-3-4. This condition specifies a engine output limit which is already specified in the equipment description.
- Condition 6 from the ATC is included as condition 14 of the requirements for permit unit S-348-3-4. Condition 6 of the ATC specifies NOx emission limits (i.e. 90% reduction on initial source test and 80% thereafter, or 90 ppmv) that were added to the ATC to assure compliance with District Rule 4701. District Rule 4701 is not in the SIP. Therefore, this condition is not federally enforceable.
- Condition 7 from the ATC is included as condition 15 of the requirements for permit unit S-348-3-4. Condition 7 of the ATC

specifies CO emission limits (i.e. 2000 ppm) that were added to assure compliance with District Rule 4701. District Rule 4701 is not in the SIP. Therefore, this condition is not federally enforceable.

- Condition 8 from the ATC is included as condition 16 of the requirements for permit unit S-348-3-4. This condition is not federally enforceable because it assure that the permit unit is exempt from the provisions of District Rule 4701 during natural gas curtailment. District Rule 4701 is not contained in the SIP. Condition 8 from the ATC limits propane backup fuel to 336 hours per year.
- Condition 9 from the ATC is included as condition 17 of the requirements for permit unit S-348-3-4. Condition 9 of the ATC requires source testing every 24 months to show compliance with the CO and NOx emission limits. This is included in the ATC as a compliance testing requirement of Rule 4701. District Rule 4701 is not in the SIP. Therefore, this condition is not federally enforceable.
- Condition 10 from the ATC is included as condition 18 of the requirements for permit unit S-348-3-4.
- Condition 11 from the ATC is included as condition 19 of the requirements for permit unit S-348-3-4. This condition is not federally enforceable because it requires recordkeeping in accordance with District Rule 4701. District Rule 4701 is not contained in the SIP.

d. Natural Gas Fired IC Engine Unit (S-348-4-4)

Permit unit S-348-4-4 was subject to the NSR Rule at the time the applicant applied for Authority to Construct (ATC) these units. ATC S-348-4-4 was issued by the District on 3/24/97.

- Condition 1 from the ATC is included as condition 11 of the requirements for permit unit S-348-4-5. This condition is not Federally enforceable because it is based on the public nuisance requirement of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the ATC is included in condition 2 of the requirements for permit unit S-348-4-5.
- Condition 3 from the ATC is included as condition 12 of the requirements for permit unit S-348-4-5.

- Condition 4 from the ATC is included as condition 13 of the requirements for permit unit S-348-4-5.
- Condition 5 from the ATC has not been included in the requirements for permit unit S-348-4-5. This condition specifies a engine output limit which is already specified in the equipment description.
- Condition 6 from the ATC is included as condition 14 of the requirements for permit unit S-348-4-5. Condition 6 of the ATC specifies NOx emission limits (i.e. 90% reduction on initial source test and 80% thereafter, or 90 ppmv) that were added to the ATC to assure compliance with District Rule 4701. District Rule 4701 is not in the SIP. Therefore, this condition is not federally enforceable.
- Condition 7 from the ATC is included as condition 15 of the requirements for permit unit S-348-4-5. Condition 7 of the ATC specifies CO emission limits (i.e. 2000 ppm) that were added to assure compliance with District Rule 4701. District Rule 4701 is not in the SIP. Therefore, this condition is not federally enforceable.
- Condition 8 from the ATC is included as condition 16 of the requirements for permit unit S-348-4-5. This condition is not federally enforceable because it assure that the permit unit is exempt from the provisions of District Rule 4701 during natural gas curtailment. District Rule 4701 is not contained in the SIP. Condition 8 from the ATC limits propane backup fuel to 336 hours per year.
- Condition 9 from the ATC is included in condition 17 of the requirements for permit unit S-348-4-5.
- Condition 10 from the ATC is included as condition 17 of the requirements for permit unit S-348-4-5. Condition 10 of the ATC requires source testing every 24 months to show compliance with the CO and NOx emission limits. This is included in the ATC as a compliance testing requirement of Rule 4701. District Rule 4701 is not in the SIP. Therefore, this condition is not federally enforceable.
- Condition 11 from the ATC is included as condition 18 of the requirements for permit unit S-348-4-5.
- Condition 12 from the ATC is included in condition 19 of the requirements for permit unit S-348-4-5. This condition is not federally enforceable because it requires recordkeeping in accordance with District Rule 4701. District Rule 4701 is not contained in the SIP.

2. District Rule 1081 - Source Sampling

- a. 778 HP Natural Gas fired IC Engine (S-348-1-4), 778 HP Natural Gas fired IC Engine (S-348-2-4), 778 HP Natural Gas Fired IC Engine (S-348-3-4), and 778 HP Natural Gas Fired IC Engine (S-348-4-5).

District Rule 1081 has been submitted to the EPA to replace Kern County Rule 108.1 which is SIP approved. District Rule 1081 is as stringent as Kern County Rule 108.1, as shown on Table 1.

Table 1 - Comparison of District Rule 1081 and Kern County Rule 108.1

REQUIREMENTS	1081 SJVUAPCD	108.1 KERN
Upon request of the APCO, the source shall provide info. and records to enable the APCO to determine when a representative sample can be taken.	✓	✓
The facility shall collect, have collected or allow the APCO to collect, a source sample	✓	✓
The source shall have District personnel present at a source test	✓	
The applicable test method, if not specified in the rule, shall be conducted in accordance with 40 CFR § 60, Appendix A	✓	
Test procedures: 1) arithmetic mean of three runs 2) a scheduled source test may not be discontinued solely due to the failure to meet the applicable standard(s), and 3) arithmetic mean of two runs is acceptable if circumstances beyond owner or operator control occurs.	✓	

Sections 3.0, 4.0, 5.0, 6.0, and 7.0 of District Rule 1081 set forth requirements for sampling facilities, collection of samples, test methods, test procedures, and administrative requirements, respectively. Compliance with these requirements is shown by condition 19 of the requirements for permit units S-348-1-4, S-348-2-4, S-348-3-4 and Condition 20 of the requirements for permit unit S-348-4-5.

X. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

By submitting model general permit template SJV-UM-0-0, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the

template. Therefore, the permit shield as granted in the model general permit template is included as conditions 38 & 39 of facility wide requirements S-348-0-0.

By submitting model general permit template SJV-IC-3-0, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shield as granted in the model general permit template is included as conditions 8 & 9 of the requirements for permit units S-348-1-4, S-348-2-4, S-348-3-4, and S-348-4-5.

By submitting model general permit template SJV-IC-4-0, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shield as granted in the model general permit template is included as conditions 8 & 9 of the requirements for permit units S-348-1-4, S-348-2-4, S-348-3-4, and S-348-4-5.

A. Requirements not Addressed by Model General Permit Templates

1. District Rule 4701

District Rule 4701 is not contained in the SIP, which means that this rule is not federally enforceable. Therefore, a permit shield is not necessary.

XI. PERMIT CONDITIONS

See draft permits beginning on the next page.

XII. EPA AND FACILITY COMMENTS

See Attachments D and E

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Attachment D

EPA Comments / District Response

EPA COMMENTS / DISTRICT RESPONSE

The EPA's comment regarding the proposed Title V Operating permit for West Kern Water District. (District Facility S-348) are encapsulated below followed by the District's response. A copy of the EPA's 1/30/98 letter is available at the District.

1. EPA COMMENTS

The permit conditions for many of the individual engines contain conflicting limits on the type of fuel that may be used. We understand that the conditions are based on combining two templates (SJV-IC-3 and SJV-IC-4). The two templates cannot be combined, however, as each is designed for sources that burn only one fuel. Template SJV-IC-3 states the source shall fire natural gas and template SJV-IC-4 states that the source shall fire LPG. Therefore, we recommend using these templates as general guidance, but evaluating the specific conditions that are appropriate for this source. The use of alternative operating scenarios (Rule 2520, section 9.11) is one possible approach to allowing the use of alternate fuels.

DISTRICT RESPONSE

Permit has been clarified to allow for the usage of two different fuels.

2. EPA COMMENTS

Verify that non-federally enforceable PTO conditions do not derive from federally enforceable requirements.

DISTRICT RESPONSE

The District has verified that non-federally enforceable conditions are not derived from federally enforceable requirements.

Attachment E

Public Comment / District Response

PUBLIC COMMENTS / DISTRICT RESPONSE

Public comments were received from West Kern Water District regarding the proposed Title V Operating Permit for their Station A facility (District facility S-348). These comments are encapsulated below followed by the District's response. A copy of West Kern Water District's 1/29/98 letter is available at the District.

1. WEST KERN WATER DISTRICT COMMENT

West Kern Water District requests to have facility description with the name, location, and equipment listing included in the facility-wide requirements.

DISTRICT RESPONSE

The cover page on the facility permit included mailing address, location, and facility description.

2. WEST KERN WATER DISTRICT COMMENT

West Kern Water District requests to have the wording " whichever is more stringent " removed from Condition 15 on all four permits, as this phrase is not included in District Rule 4701.

DISTRICT RESPONSE

There is no basis for this restriction. Therefore, the permits will be changed to reflect the request.

3. WEST KERN WATER DISTRICT COMMENT

West Kern Water District requests that the District modify the language in Condition 17 in all four permits to read "Propane can be used.." instead of the current proposed language "Propane shall be used..."

DISTRICT RESPONSE

The permits will be changed to reflect the request.

4. WEST KERN WATER DISTRICT COMMENT

West Kern Water District requests the District to specify in Condition 18 of permits S-348-1-4, 2-4, 3-4, and Condition 19 or permit 4-5 that compliance source testing only be required when using natural gas.

DISTRICT RESPONSE

This requirement is a District-only Condition carried over from the existing PTO and not a federally enforceable requirement. Therefore, it is not within the scope of this evaluation to address this condition.

5. WEST KERN WATER DISTRICT COMMENT

West Kern Water District requests that the District remove Condition 18 from permit S-348-4-5 because all four engines are identical, and therefore all conditions should be identical. Condition 18 is listed as a federally enforceable condition referencing maintaining CO emissions within permitted emission limits. The only other reference to CO emission in the draft permit is in Condition 16 which is not federally enforceable. The two conditions seem to contradict each other.

DISTRICT RESPONSE

Condition 18 will be removed from the permit.